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| **COUNTY COURT**  GILPIN COUNTY, COLORADO  2960 Dory Hill Road, Suite 200 Black Hawk, CO 80422 | DATE FILED: December 20, 2016 FILING ID: 6FCEB68E28819 CASE NUMBER: 2016T169 |
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| **Plaintiff(s):**  PEOPLE OF THE STATE OF COLORADO |  |
| **Defendant(s):**  ROBERT FRIEDLANDER | COURT USE ONLY |
| **ATTORNEYS FOR THE DEFENDANT**  FIFE LUNEAU, P.C. CHARLES L. FIFE, #17799 DANNY LUNEAU, #43639 | Case Number: 16 T 169  Division: 1 |
| 1873 S. BELLAIRE, SUITE 200  DENVER, CO 80222 Ph:(303)757-2200 FAX: (303)756-6160 |  |
| **MOTION FOR SPECIFIC DISCOVERY:**  **EVIDENTIAL BREATH ALCOHOL TEST (EBAT) OPERATOR CERTIFICATIONS AND DISPATCH TAPE** | |

COMES NOW, the Defendant, above named, by and through his undersigned attorneys, Fife Luneau, P.C., pursuant to Rule 16 of the Colorado Rules of Criminal Procedure and moves the Prosecutor to forthwith provide Dpeuty Cooksey and Trooper Sullivan’s EBAT operator certifications as well as the dispatch tape. As grounds, Defendant states as follows:

1. On or about May 30, 2016, Defendant was arrested for driving under the influence and submitted to a breath alcohol test.
2. Trooper Sullivan of the Colorado State Patrol and Deputy Cooksey of the Gilpin County Sheriff’s Office conducted Defendant’s breath test.
3. Defendant is requesting the Intoxilzyer 9000 operator certifications for both Trooper Sullivan and Deputy Cooksey. Defendant is also requesting copies of all dispatch tapes recording any conversations relating to the events in this case.
4. Defense counsel needs abovementioned items to prepare

for trial.

WHEREFORE, Defendant requests that the above item be provided to his attorneys as soon as practical.

Respectfully submitted,

/s/Danny Luneau Charles L. Fife Danny Luneau

ATTORNEYS FOR DEFENDANT

CERTIFICATE OF MAILING

I do hereby state and affirm that a copy of the foregoing **MOTION FOR SPECIFIC DISCOVERY** was served, via ICCESS, this 3rd day of December, 2016:

Office of the District Attorney County of Gilpin

/s/Danny Luneau